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30 Attorneys for Defendants
31 THE REGENTS OF THE UNIVERSITY OF CALIFORNIA,
32 PAMELA E. ROSKOWSKI, JON EASTERBROOK, and
33 BARNEY RIVERA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

REGGIE HAMILTON,

Plaintiff,

vs.

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA, PAMELA E. ROSKOWSKI,
JON EASTERBROOK, BARNEY RIVERA
and DOES 1 through 15,

Defendants.

Case No.: C10-01622 DMR

**STIPULATION AND PROPOSED
ORDER CONTINUING DISCOVERY
DEADLINES AS MODIFIED**

The parties hereby stipulate by and through their undersigned counsel of record to request that this Court continue the lay and expert witness discovery deadlines by approximately thirty days as set for the below.

Good cause exists for the above requests, as follows:

1. At the October 11, 2011 settlement conference before Magistrate Judge Joseph C. Spero the parties reached a settlement in principle.
2. Based on the settlement in principle the parties have stayed discovery since October 11, 2011.
3. The parties are currently working on the details of settlement, some of which require the Regents to seek detailed internal guidance.
4. The Regents are currently drafting a detailed settlement agreement, but have not forwarded the draft to Mr. Hamilton
5. The Regents shall forward Mr. Hamilton the draft settlement agreement on or before December 14, 2011.

- 1 6. It is anticipated that once finalized and executed, the settlement agreement
2 will obviate the need for further litigation in the matter.
3 7. The deadline to complete lay discovery and designate expert witnesses is
4 currently December 14, 2011, and the deadline to complete expert witness
5 discovery is January 13, 2012.
6 8. The last day to hear dispositive motions is January 5, 2012 and the Final
7 Pretrial Conference Statement and Trial Briefs are due February 4, 2012.
8 9. Continuing the lay discovery and expert witness disclosure deadline to
9 January 16, 2012 and the completion of expert discovery to February 3, 2012
10 will allow the parties to focus all of their attention on settlement the matter.

11 Given all of the above, a continuance of the Case Management Conference and
12 Discovery deadlines will serve judicial economy and spare the parties considerable and
13 likely needless discovery-related expense.

14 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

15 PRICE AND ASSOCIATES

16 DATED: December 8, 2011

17 _____
18 /s/
19 PAMELA Y. PRICE, ESQ.
20 Attorneys for Plaintiff REGGIE
21 HAMILTON

22 DATED: December 8, 2011

23 LAW OFFICE OF CURTIS E. ALLEN

24 _____
25 /s/
26 CURTIS E. ALLEN, ESQ.
27 Attorneys for Plaintiff REGGIE
28 HAMILTON

1 STUBBS & LEONE
2

3 DATED: December 8, 2011

/s/

4 CLAUDIA LEED, ESQ.
5 Attorneys for Defendants THE
6 REGENTS OF THE UNIVERSITY OF
7 CALIFORNIA,
PAMELA E. ROSKOWSKI, JON
EASTERBROOK, and BARNEY
RIVERA
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10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

11 The deadline to complete all lay discovery and to designate expert witnesses is
12 continued to January 16, 2012. The deadline to complete expert witness discovery is
13 continued to February 3, 2012. Final Pretrial Conference Statement and Trial Briefs
14 are due February 24, 2012. All other dates previously set by the court shall remain in
15 effect.

16 The Case Management Conference scheduled for December 14, 2011 at 1:30
17 p.m. has been CONTINUED to January 11, 2012 at 1:30 p.m. An updated joint Case
18 Management Conference statement is due by January 4, 2012.

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20 DATED: December 9, 2011



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22 DONNA M. RYU
United States Magistrate Judge